

memorandum

Idaho Operations Office

Date: July 16, 2002

Subject: ACTION: EM-1 Approves Milestone Change Strategy for INEEL OU 10-08 Record of Decision (EM-ER-02-114)

To: Jessie Hill Roberson
Assistant Secretary for Environmental Management

Through: Mark W. Frei, DOE-HQ/EM-40

BACKGROUND:

Operable Unit 10-08 concerns the portion of the Snake River Plain Aquifer underlying the INEEL. The aquifer has been contaminated by the past practice of direct waste injection and from infiltration of waterborne and volatile contaminants. The INEEL CERCLA strategy has been to make the OU 10-08 ROD the final decision document under the FFA/CO in order to address any residual risks remaining after remediation at the individual Waste Area Groups. The current schedule for that decision includes submission of a draft ROD to the regulators in October 2004. However, the October 2004 date should be deferred in order to reflect the recent resolution of the Pit 9 dispute and the strategy in the INEEL Performance Management Plan (PMP) which pushes the WAG 7 ROD signature date into FY 07.

DISCUSSION:

The regulators have requested that the OU 10-08 draft ROD be submitted after the draft ROD for OU 7-13/14. This would allow the estimated residual risk from the Subsurface Disposal Area (SDA), based on the selected SDA remedy, to be included in OU 10-08's modeling of the Snake River Plain Aquifer. This request for a change in the milestone date is in agreement with the INEEL PMP strategy. Specifically, DOE should tie the new milestone date to the date of signature for the OU 7-13/14 ROD (e.g., The OU 10-08 draft ROD will be submitted to the IDEQ and EPA during December 2008, which is 24 months after the date of signature for the OU 7-13/14 ROD.).

CONCLUSION:

Positive Impacts: (1) Changing the milestone strategy to tie it directly to the OU 7-13/14 ROD will allow a more accurate assessment of residual risk from the SDA. Preliminary modeling indicates that no additional aquifer remedial actions, beyond those agreed upon in existing INEEL RODs, will be required. No increase in the total cost of characterization is expected. Effective use of data being collected to support other INEEL agreements should offset the cost increases that result from any deferral.

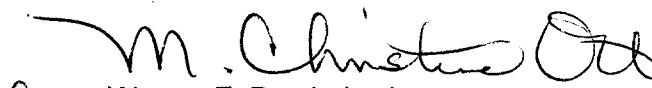
(2) Since no additional remedial actions are anticipated, the change in milestone date should not increase the EM timeline. The ROD can also be used to collect and resolve any emerging INEEL CERCLA issues.

(3) Financial resources will be used more wisely. In the absence of this milestone deferral, two expensive modeling efforts would be required. The first would support the ROD and the second, and later, effort would be needed after the OU 7-13/14 ROD is signed to verify the adequacy of the aquifer ROD decision.

Negative Impacts: The assumption that no additional aquifer remediation will be required is based on current drinking water standards and long-term federal control of the INEEL. Because CERCLA RODs lock the level of remediation to the standards in place at time of signature, deferral of this ROD increases the risk that more conservative environmental standards could be promulgated in the next few years.

RECOMMENDATION:

Approve milestone change strategy for INEEL OU 10-08 Record of Decision.


for Warren E. Bergholz, Jr.
Acting Manager

APPROVED:

Jessie Hill Roberson
Assistant Secretary for
Environmental Management

DISAPPROVED:

Jessie Hill Roberson
Assistant Secretary for
Environmental Management

DATE:
